



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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August 25, 2006

Paul L. Mina  
Executive Director, Mass211, Inc.  
President and CPO, United Way of Tri-County  
46 Park Street  
Framingham, MA 01702

RE: Petition of Mass 211, Inc. requesting approval by the Department of  
Telecommunications and Energy to implement the abbreviated dialing code "211" for  
use as a statewide community information and referral service  
D.T.E. 06-30

Dear Mr. Mina:

I. BACKGROUND

On May 12, 2000, the Department of Telecommunications and Energy ("Department") approved the assignment of the abbreviated dialing code "211" to Mass211, Inc. ("Mass211") for use as a community information and referral service in the Commonwealth of Massachusetts. See Petition by the Massachusetts Association of Information and Referral Services and the Council of Massachusetts United Ways, acting in partnership as the Mass 211 Task Force, requesting approval by the Department of Telecommunications and Energy for the assignment of the abbreviated dialing code "211" to the Mass 211 Task Force for use as a statewide community referral service, D.T.E. 99-71 (2000) ("211 Assignment Order"). The Department's assignment of the 211 code to Mass211, however, was conditioned upon Mass211 securing firm commitments for sufficient operational funding. 211 Assignment Order at 15. Specifically, the Department stated that prior to implementation, the Department would review the sufficiency and firmness of both short and long term funding for the 211 program. Id.

## II. PROCEDURAL HISTORY

On December 13, 2005, Mass211 submitted to the Department for review and approval Mass211's income and expense plan outlining its start-up phase and year one budget ("Mass211 Initial Filing"). Mass211 submitted additional documentation to support its request for Department approval prior to implementation of the 211 community information and referral service on March 28, 2006. This documentation includes: (1) Mass211's Executive Summary; (2) Contact Information for the Mass211 Board of Directors and Executive Director; (3) Funding Commitment Letters and Spreadsheet; (4) Detailed Program Proposal of The Medical Foundation<sup>1</sup>; and (5) executed Service/Management Contract with the United Way of TriCounty (collectively, "Mass211 March Documentation").

On April 28, 2006, the Department held a public hearing in this matter. No objections to the Mass211's petition for approval to implement the 211 community information and referral service were received by the Department.

On July 21, 2006, Mass211 submitted the following documentation in support of its request for final approval to implement the 211 dialing code: (1) Revised Executive Summary and Budget, dated July 7, 2006; (2) Service Agreement with Verizon New England, Inc. ("Verizon") for 211 dialing service; (3) Addendum to Mass211's contract with The Medical Foundation; and (4) spreadsheet listing the status of Mass211's discussions with facilities-based telecommunications carriers in the Commonwealth regarding implementation of the 211 dialing code (collectively, "Mass211 July Documentation").<sup>2</sup> On August 3, 2006, Mass211 submitted additional documentation: (1) funding commitment letters for the 211 program from three additional Massachusetts United Ways; (2) Mass211's invoice to North Shore United Way for the 211 program; (3) North Shore United Way payment check, dated June 16, 2006; (4) e-mail from Breakfast with United Way Online regarding status of The Calling for 2-1-1 Act of 2005, S. 211/H.R. 896, 109<sup>th</sup> Cong. (2005); and (5) map charting 211 implementation across the United States (collectively, "Mass211 August Documentation").

Lastly, since July 1, 2006, Mass211 has been operating the community information and referral call center using a toll-free number, 877-211-6277 (see Mass211 August

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<sup>1</sup> The Medical Foundation is an established call vendor center that was selected by Mass211 through a competitive bidding process to administer the 211 community information and referral service (see Mass211 March Documentation, Executive Summary at 2).

<sup>2</sup> On July 31, 2006, Mass211 filed copies of the fully executed Verizon Service Agreement and The Medical Foundation contract addendum.

Documentation, Cover Letter at 1). The call center is based upon a single, central call center model which is operated by The Medical Foundation, with whom Mass211 has an executed contract for call vendor services (Mass211 July Documentation, Revised Executive Summary and Budget at 2). Mass211 contracted with the United Way of Tri-County, headquartered in Framingham, to provide daily management, financial oversight, and marketing for the call center (id.).

### III. ANALYSIS AND FINDINGS

#### A. Start Up and Year One Budget

After review and consideration, the Department determines that Mass211 has demonstrated that it has secured sufficient funding to operate and maintain the 211 program. Mass211's documentation indicate that the revenues for the start-up phase and the year one phase meets or exceeds the expenses for that period (Mass211 Initial Filing, Income and Expense Plan; Mass211 July Documentation, Revised Executive Budget and Summary).<sup>3</sup> Regarding the three-month start up phase, Mass211 reports \$18,000 in expenses, which would be funded entirely by the United Ways of Massachusetts (Mass211 Initial Filing, Income and Expense Plan).

Regarding Mass211's financial readiness to implement the abbreviated dialing code across the Commonwealth and to maintain the 211 program after the start up phase, Mass211 reports that the expenses for the first year of operation will be \$530,718 (Mass211 July Documentation, Revised Executive Summary and Budget at 3). As to revenues, Mass211 has received funding commitments for the 211 program from 14 Massachusetts United Ways totaling \$489,000 annually for three years (Mass211 March Documentation, Funding Commitment Letters and Spreadsheet; Mass211 August Documentation, Funding Commitment Letters).<sup>4</sup> In fact, Mass211 has been receiving payments from supporting United Ways for several months (see, e.g., Mass211 August Documentation, North Shore United Way Check). Additionally, Mass211 will receive an additional \$12,000 in the funding from the Counsel of

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<sup>3</sup> It is noted that Mass211's income and expense plans does not reflect the \$120,000 of in-kind support to Mass211 as a result of Mass211's agreement with the Commonwealth of Massachusetts' Executive Office of Health and Human Services (Mass211 Initial Filing, Summary).

<sup>4</sup> Additionally, the Hampshire County United Way has committed to an unspecified amount for the 211 program for 2007 and 2008 (Mass211 August Documentation, Funding Commitment Letter from Hampshire County United Way).

Massachusetts United Ways in the fall of 2006 (Mass211 August Documentation, Cover Letter at 1). Mass211 will also seek additional funding through grants from foundations in the amount of at least \$35,000 annually (Mass211 July Documentation, Revised Summary and Budget). Lastly, Mass211 has secured a line of credit from TD Banknorth in the amount of \$125,000 (Mass211 August Documentation, TD Banknorth Letter). In total, Mass211 reports \$536,000 in revenues for year one (Mass211 July Documentation, Revised Executive Summary and Budget at 3). Thus, along with the \$125,000 line of credit, Mass211 has demonstrated that it has secured sufficient operational funding to cover its projected year one expenses of \$530,000.<sup>5</sup>

B. Long Term Funding

The majority of the funding for the 211 program over the first three years of operation is from individual Massachusetts United Ways and the Council of Massachusetts United Ways. Mass211, however, has not provided any documentation of firm funding commitments for the 211 program beyond three years (i.e., long term funding). Given that the Massachusetts United Way system and the United Way of America deems the 211 program one of its “signature projects” (see Mass211 August Documentation, Cover Letter at 2), we expect the Massachusetts United Ways would continue their financial support of the 211 program in the long term. In addition, we review alternative funding sources.

Currently, federal legislation is pending which, if approved, would authorize the appropriation of federal funds to implement and sustain 211 programs nationwide. See The Calling of 2-1-1 Act of 2005, S. 211/H.R. 896, 109<sup>th</sup> Cong. (2005).<sup>6</sup> At the close of the 108<sup>th</sup> Congress, there were 182 bi-partisan co-sponsors of the Act (see [www.211.org/legislation.html](http://www.211.org/legislation.html)). If enacted, the Act would enable Mass211 not only to continue the 211 program beyond year three but also to expand the 211 program. State

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<sup>5</sup> Given the three-year financial commitment of Massachusetts United Ways, Mass211 will likely have sufficient funding to operate the 211 program through the second and third years of operation, assuming expenses are consistent with first year projections.

<sup>6</sup> The Calling of 2-1-1 Act of 2005 (“Act”) authorizes \$150 million annually for the first two years, and \$100 million for the following four years, to assist states with implementing and sustaining statewide 211 programs. The Act would require participating states to provide a 50 percent match to the grant, which could come from current 211 funding in the community, such as United Way funding, funding from other non-profits, state and local government, foundations and businesses. See The Calling of 2-1-1 Act of 2005, S. 211/H.R. 896, 109<sup>th</sup> Cong. (2005)).

legislation is also being explored. Mass211 states that Senator Karen Spilka, along with more than 40 representatives and senators across the Commonwealth, have agreed to sponsor a supplemental budget request in the fall in support of the 211 program (Mass211 August Documentation, Cover Letter at 2; Mass211 July Documentation, Executive Summary at 3). Additionally, Mass211 states that it will be seeking a line item in the budget of the Executive Office of Health and Human Services<sup>7</sup> for fiscal year 2008 for an undetermined amount (Mass211 August Documentation, Cover Letter at 2). Finally, Mass211 is also exploring funding from corporations and foundations as well as funding options related to terrorism, bio-terrorism, national disaster preparedness and pandemic preparedness (Mass211 July Documentation, Revised Executive Summary and Budget at 4).

Based upon the documentation presented by Mass211, there is some financial uncertainty as to the long term funding of the 211 program. Nevertheless, the Department determines that the benefits to the public of the 211 program outweigh the risks of allowing implementation of the 211 dialing code for use as an information and referral service in the Commonwealth. First, there are currently over 100 comprehensive and specialized information and referral organizations in the Commonwealth, each with their own name and ten-digit phone number (Mass211 July Documentation, Revised Executive Summary and Budget at 1). By providing an easy-to-remember three-digit number to access all health and human service organizations and government agencies throughout the Commonwealth, the 211 program will assist citizens of the Commonwealth in navigating the complex maze of human service agencies and programs (*id.*).

Second, while the value of a statewide 211 program is difficult to quantify, we note that a national cost benefit analysis conducted by the University of Texas estimates the net value to society of a national 211 system approaching \$130 million in the first year alone and a conservative estimate of nearly \$1.1 billion over 10 years (*see* The Calling for 2-1-1 Act of 2005, S. 211/H.R. 896, § 2(5), 109<sup>th</sup> Cong. (2005)).

Third, given the FCC's nationwide assignment of the 2-1-1 dialing code for information and referral services, even if long term funding for the 211 program does not materialize, there are no negative consequences from a numbering standpoint in granting Mass211's petition for

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<sup>7</sup> The Executive Office of Health and Human Services ("EOHHS") is a state agency which has partnered with Mass211 to provide a statewide database, the Resource Locator, that is currently used by six comprehensive information and referral programs (*see* Mass211 July Documentation, Revised Executive Summary and Budget at 2). Mass211 notes that the financial investment represented by EOHHS's involvement is over \$225,000 for fiscal year 2007 (*id.*).

final approval to implement the 211 dialing code here in the Commonwealth. From a consumer perspective, some confusion may result from the possible discontinuance of the 211 abbreviated dialing code, but we would expect that Mass211 would revert back to using a toll-free ten-digit number.

Finally, we note that there is broad national support for 211 programs. Three months after the Department issued its 211 Assignment Order assigning the 2-1-1 dialing code to be used as an information and referral service in the Commonwealth, the Federal Communications Commission (“FCC”) assigned the 2-1-1 code to be used exclusively for access to community information and referral services on a nationwide basis.<sup>8</sup> See FCC 211 Assignment Order. Currently, 39 states, including Washington D.C. and Puerto Rico, have implemented 211 programs, with 16 of those states having 100 percent statewide coverage (Mass211 August 2006 Documentation, Nationwide 211 Implementation Map).

Accordingly, based upon the evidence in the record, Mass211 has secured sufficient funding to implement and maintain the 211 program for three years and that, despite concerns regarding the long term funding for the program, the overall benefit to the public of the 211 program outweighs the financial uncertainty. Therefore, the Department grants the petition of Mass211 for final approval to implement the abbreviated dialing code 211 as a community information and referral service in the Commonwealth of Massachusetts.

C. Implementation of the 211 Abbreviated Dialing Code

The Department’s approval of Mass211’s petition for final approval to implement the 211 dialing code for use as an information and referral service is effective immediately. All telecommunications carriers operating in the Commonwealth must make the necessary modifications to their switching equipment to route 211 calls to Mass211’s toll-free number designated for acceptance of 211 calls, 800-231-4377.

We do not anticipate any difficulties for carriers in making the necessary modifications to their equipment. Mass211 has stated that all facilities-based carriers in Massachusetts have agreed to make the necessary modifications to accomplish this (see Mass211 July 2006

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<sup>8</sup> In the Matter of Request by the Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc., and Texas I&R Network for Assignment of 211 Dialing Code, NSD-L-98-80, N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Third Report and Order and Order on Reconsideration, FCC 00-256 (July 21, 2000) (“FCC 211 Assignment Order”).

Documentation, Telecommunications Carriers Spreadsheet). In fact, Mass211 states that all facilities-based telecommunications operating in the Commonwealth have either completed the switch translations for routing 211 calls to the toll-free number, or that they will complete the switch translations by August 25, 2006 (Mass211 August Documentation, Cover Letter at 1; see also Mass211 July Documentation, Telecommunications Carrier Spreadsheet).<sup>9</sup> According to Mass211, all facilities-based carriers, with the exception of Verizon, have agreed to complete the switch translations to properly route 211 calls at no charge to Mass211. As for Verizon, Mass211 has executed a contract with Verizon to properly route 211 calls (see Mass211 July Documentation). Accordingly, only final Department approval to implement the 211 abbreviated dialing code to replace the toll-free number currently in use is necessary for implementation of the 211 program. We grant that approval here.

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<sup>9</sup> Verizon Wireless has also implemented the 211 dialing code nationwide at no charge despite the exemption granted in the 211 Assignment Order at 19 to wireless carriers (Mass211 July Documentation, Telecommunications Carrier Spreadsheet).



IV. CONCLUSION

The Department grants Mass211's petition for final approval to implement the abbreviated dialing code 2-1-1 for use as a statewide community information and referral services effective immediately. The Department directs all facilities-based telecommunications carriers operating in the Commonwealth to make the necessary modifications to properly route 2-1-1 calls to the toll-free number, 800-231-4377, designated by Mass211 for the 211 program.

By Order of the Department,

/s/  
Judith F. Judson, Chairman

/s/  
James Connelly, Commissioner

/s/  
W. Robert Keating, Commissioner

/s/  
Brian Paul Golden, Commissioner